

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 15-11

IGOR OVCHINNIKOV, IRINA RZAEVA, and DENIS NEKIPELOV,

— vs. —

**MICHAEL HITRINOV a/k/a
MICHAEL KHITRINOV,
EMPIRE UNITED LINES CO., INC., and CARCONT, LTD.**

INFORMAL DOCKET NO.: 1953(I)

KAIRAT NURGAZINOV,

— vs. —

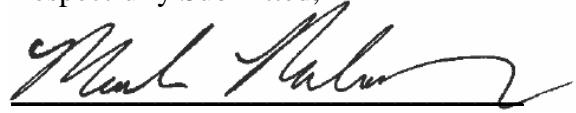
**MICHAEL HITRINOV a/k/a
MICHAEL KHITRINOV,
EMPIRE UNITED LINES CO., INC., and CARCONT, LTD.**

NOTICE OF CROSS-MOTION

PLEASE TAKE NOTICE, that pursuant to Rules 13, 69, 71, and 201 of the Federal Maritime Commission's ("FMC") Rules of Practice and Procedure 46 C.F.R. 502 et seq., Complainants, by their Counsel, Marcus A. Nussbaum, Esq., hereby move for an Order: (1) sealing all filings made to date by non-party Sergey Kapustin; (2) for a Protective Order enjoining said non-party from docketing any further filings unless permission is granted to intervene; and (3) such other and further relief as the Presiding Officer may deem just and proper under the circumstances.

Dated: Brooklyn, New York
August 19, 2016

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Marcus A. Nussbaum", written over a horizontal line.

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